

---

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

---

IN THE MATTER OF: : CHAPTER 13  
CYNTHIA SANTIAGO, : CASE #20-10164-ELF  
Debtors. : Hearing Date: August 16, 2022  
: **SUPPLEMENTAL CERTIFICATION  
IN SUPPORT OF MOTION TO SELL  
REAL ESTATE**

CYNTHIA SANTIAGO, of full age, certifies as follows:

1. I am the debtor in the above matter and, as such, I am fully familiar with the facts and circumstances herein.
2. On January 9, 2020, I filed a Petition For Relief under Chapter 13 of the Bankruptcy Code.
3. It has been a struggle to make monthly payments. I have tried to keep expenses to a minimum but paying normal living expenses and the trustee is difficult.
4. I have decided to sell my real estate and, in that regard, I enclose a copy of an Agreement for the Sale of Real Estate attached hereto, marked Exhibit "A".
5. The proposed sale is to Cherie Austin for the sum of \$350,000.00.
6. I seek court approval for the sale of 81 Old Cedarbrook Road, #10, Wyncote, PA 19095 so that I can satisfy the mortgage and other liens.
7. The sale price is not sufficient to cover all required costs.
8. However, Wyngate Homeowners Association has agreed to accept \$4000.00 at closing and release their lien as long as the balance estimated to be about \$7,200.00 gets paid in full through the Chapter 13 Plan.

9. I anticipate that my rental payment will be less than my current mortgage payment of \$2,735.00 and Homeowners payment of \$175.00 which will allow me to not only pay the \$7200.00 to Wyngate, but increase the total amount to general unsecured creditors as well who were receiving \$320 total under the most recent plan.

10. Under the circumstances, I ask that the Court approve the Motion to allow the sale of real estate.

I certify that the foregoing statements made by me are true. I am aware that if any of said statements are willfully false, I am subject to punishment.

DATED: August 8, 2022

  
Cynthia Santiago